



SDMS DocID 559867

HOLMES & ELLS

Attorneys At Law
Gary W. Holmes
Stephen G. Ells
Michael R.S. Donaghy
(Also admitted Mass. & D.C.)

47 Winnacunnet Road
Hampton, New Hampshire 03842
Fax 603/926-9853
603/926-6162

March 8, 1990

Environmental Protection Agency
Steven J. Calder, Waste Management Division
JFK Federal Building HSN-CAN5
Boston, Massachusetts 02203

Superfund Records Center
SITE: Coakley
BREAK: 11.9
OTHER: 559867

Re: Richard M. Philbrick Trucking/Coakley Landfill, North Hampton, New Hampshire

Gentlemen:

Please be advised that this office represents Richard M. Philbrick Trucking and Richard M. Philbrick of Rye, New Hampshire, with regard to the above matter. I have enclosed herein answers to the information request known as Attachment A to your letter of February 2, 1990.

My client is not at this time willing to accept liability or to perform or finance the activities described in your letter of February 2nd. We do, however, confirm our cooperation and assistance in resolving the issues outlined in your letter. Please feel free to contact me in the event you have further questions.

Very truly yours,


Gary W. Holmes

GWH/cm
Enclosure

cc: Richard M. Philbrick

RICHARD M. PHILBRICK TRUCKING
RYE, NEW HAMPSHIRE

ANSWERS TO ATTACHMENT A
FEBRUARY 2, 1990

- 1.a. There was no practice of segregation, although certain waste products were not accepted for transportation.
- b. No change.
- c. There was no documentation during this time except customer lists and ledger of bills and receipts. Each truckload of material hauled from residents in the towns of North Hampton and Newcastle were charged to the town. Neither of the towns paid the Coakley landfill directly, but rather paid the City of Portsmouth. (See prior answers to questions for customer lists and other documentation)
2. This was not an allowed practice and we know of no businesses or individuals who used this practice.
3. The towns of Newcastle and North Hampton, New Hampshire. See also customer list which had previously been forwarded.